



December 18, 2019

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notice
IBFS File No. SAT-LOA-20190704-00057; Call Sign S3051

Dear Ms. Dortch:

On December 16, 17, and 18, 2019, Julie Zoller, Mariah Shuman, and Darren Achord of Amazon, and Trey Hanbury of Hogan Lovells US LLP met with Bill Davenport, Chief of Staff and Senior Legal Advisor to Commissioner Geoffrey Starks; Will Adams, Wireless Legal Advisor to Commissioner Brendan Carr; Erin McGrath, Wireless Legal Advisor to Commissioner Michael O’Rielly; Umair Javed, Wireless Legal Advisor to Commissioner Jessica Rosenworcel; and Aaron Goldberger, Wireless Legal Advisor to Chairman Ajit Pai. During the meetings, Amazon briefed these individuals on the proposed Kuiper System’s application status and the public benefits of deployment of the Kuiper System.¹

Amazon’s representatives explained that the Kuiper System will offer high-quality, low-latency broadband service to consumers and businesses across the country, especially in unserved and underserved areas. Amazon’s representatives also described how expeditious grant of the Kuiper Application will promote the public interest by providing greater access to affordable connectivity.

Amazon’s representatives emphasized that waiver of Section 25.157(c) of the Commission’s rules, which specifies processing round procedures for NGSO systems, and application of the Commission’s existing rules and policies governing spectrum sharing to the Kuiper Application will provide regulatory certainty, encourage further investment, and accelerate the delivery of high-quality broadband service to customers. Amazon’s

¹ Kuiper Systems LLC (“Kuiper”) is a wholly owned subsidiary of Amazon.com Services, Inc. (collectively “Amazon”). *See generally* Application of Amazon, File No. SAT-LOA-20190704-00057, Call Sign S3051 (filed July 4, 2019) (“Kuiper Application”).

representatives explained how good-faith coordination between parties on an equal footing can ensure compatibility between systems, increase spectrum efficiency, and encourage new entry into the satellite broadband market.

Please contact me with any questions.

Respectfully submitted,

/s/ **Mariah Shuman**

Mariah Shuman
Corporate Counsel, Project Kuiper
Kuiper Systems LLC,
an Amazon subsidiary